Exhibit B

<u>AFFIDAVIT OF MŨKOMA NG</u>ŨGĨ

I swear under penalty of perjury that the following is true and correct:

- 1. My name is Mũkoma Ngũgĩ, I am a Professor at Cornell University in the Department of Literatures in English and I reside in Tompkins County, New York.
- 2. I am the author of numerous non-fiction works, novels and volumes of poetry focusing on the struggle of the people of the African continent for liberation from the centuries-long impact of colonial exploitation. My work is recognized and taught world wide.
- 3. I have been a close associate and friend of Momodou Taal on campus. I have mentored him, I have helped him as he navigates his academic career, and I've also been someone to whom he has often come for personal advice about the best way to maintain his political and personal integrity while also teaching his courses in an objective way. I have great respect for the way he has stood up for himself and expressed his views about what Israel has done to the population of Palestine. His principled stance against all oppressions (including racial, class, gender, sexuality), is something I admire about him. Momodou Taal is a brilliant student that any professor would be happy to have in class.
- 4. Since the issuance of the executive orders by Trump, I have been deprived of my right to listen to my colleague's views and opinions. I want to help him develop his scholarship, but this is very hard to do under conditions where I am worried about whether the university or outside forces will monitor and report the things that we say to each other, either in class or otherwise.
- 5. As a result of the executive orders, Momodou and I have stopped engaging with each other in public in the way we used to. It has been hard for me, as someone who always values what he has to say, to reconcile my desire to keep teaching others with my desire to speak up against his being silenced. I truly wish I could call a public meeting—or even invite professors to dinner to

meet with Momodou and hear his perspective on things—but I can't. I'm too worried about

putting him at risk of deportation, since I'm also associated with criticism of U.S. foreign policy

and the policies of the government of Israel. I do also worry about whether my own association

in public with Momodou would be seen as "anti-Semitic." Neither of us has any ill feelings

toward our Jewish colleagues and friends who have struggled with us against oppression and

state violence.

6. I will say that I am particularly upset that Momodou was forced to miss his book launch. I know

that for an author, a book launch is a critical moment in one's academic and intellectual life.

There is something about shaking hands with one's readers, hearing their thoughts, talking to

them in person, signing their copies—Momodou missed out on all of this because he has a

legitimate fear of being turned away at the border for no good reason, given that the things he

said while residing in the U.S. should be protected by the Constitution.

7. I am afraid of being subjected to criminal prosecution as a result of the second executive order

that mentions "anti-Semitism" without a clear definition. I have been critical of multiple

governments (African governments, the Israeli government, the US government) and I don't

believe we should conflate criticism of the State with criticism of a State's citizenry.

8. I believe the legal term is "irreparable harm." I certainly feel that I've been harmed in a way that

I can't repair unless and until I'm able to speak freely and openly with Momodou Taal again.

Signed, \sim

Date: 14th March 2025